

# Sara Avakian

SHAREHOLDER

she / her / hers

Chicago, IL | 312.873.2993

[savakian@polsinelli.com](mailto:savakian@polsinelli.com)



Sara Avakian focuses her practice in regulatory and operational compliance of health care providers, including long-term care facilities, senior housing entities, hospitals, and laboratories. Clients rely on Sara's guidance to maintain compliance with state licensing and federal certification regulations.

From reviewing and drafting contracts to responding to surveys, Sara assists with resolving regulatory issues with government agencies. Sara assists providers on all operational and regulatory matters, including:

- Responding to investigations and surveys;
- Appealing survey findings and sanctions;
- Training on policies and residency contracts;
- Regulatory compliance, crisis management, and corrective active plans;
- Drafting contracts, compliance plans, and policies;
- Abuse, neglect, and incident investigations and reporting;
- Life Safety Code compliance;
- Fair Housing Act compliance;
- Strategies for dealing with difficult families.

Sara is also able to capitalize on her litigation background to assist clients with the specialized disputes health care providers face, including administrative hearings before state and federal agencies and in state circuit courts. She routinely appears before regulatory agencies that oversee the health care industry, including the Centers for Medicare and Medicaid, the Office of the Inspector General, the Department of Healthcare and Family Services, the Illinois Department of Public Health, the Illinois Department of Professional and Financial Regulation, and other state and federal governmental agencies on behalf of clients.

## Education

- Loyola University Chicago School of Law (J.D., *cum laude*, 2015)
  - Deans List; CALI Award in Illinois Litigation
- Grand Valley State University (B.A., 2011)
  - Criminal Justice, Psychology; Dean's List; Order of Omega

## Capabilities

- Senior Housing & Long Term Care
- Laboratories
- Health Care Litigation
- Health Care
- Post Chevron Educational Resources & Updates
- Health Care Reimbursement

## Bar Admissions

- Illinois, 2015

## Memberships

- Chicago Bar Association
- Illinois Association of Healthcare Attorneys
- Illinois State Bar Association

## Recognition

- Named one of *Best Lawyers: Ones to Watch® in America* in Health Care Law, 2024-2026

# Matters

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- Represented continuing care retirement communities in a multi-year Fair Housing Act investigation by Department of Justice, with nearly 1 million documents reviewed, resulting in the government declining to bring formal charges.
  - Assisted Supportive Living Facilities obtain a preliminary injunction against the Illinois Department of Healthcare and Family Services requiring the government agency to comply with its HCBS Waiver and Illinois regulations for the Dementia Care program.
  - Assisted a skilled nursing facility appeal federal certification deficiencies cited at the immediate jeopardy level before the Appellate Division of the Departmental Appeals Board and received with favorable decision from the Board reducing the duration of the immediate jeopardy from 51 days to 1 day. Further assisted the skilled nursing facility in its appeal to the U.S. Court of Appeals for the Seventh Circuit, participating in mediation and further reducing the imposed Civil Money Penalty.
  - Represented a licensed health care provider in a challenge to her professional license before the Illinois Department of Financial and Professional Regulation, which resulted in all allegations against the professional being dismissed.
  - Drafted successful arguments resulting in the deletion of federal certification deficiencies cited against a skilled nursing facility during a survey through the Informal Dispute Resolution process.
  - Successfully negotiated a favorable settlement with the Centers for Medicare & Medicaid Services to reduce the scope and severity of federal certification deficiencies.
  - Represented a skilled nursing facility in involuntary transfer and discharge proceedings before the Illinois Department of Health where resident ceased paying for services.
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# Publications

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April 30, 2026

**CMS Issues a Proposed Rule Impacting Quality Reporting, Care Compare and MDS Requirements for Skilled Nursing Facilities**

January 20, 2026

**2026 Health Care Reimbursement Newsletter**

December 16, 2025

**CMS Indefinitely Suspends SNF Ownership Disclosure Deadline**

April 22, 2025

**CMS Extends Revalidation Deadline for Skilled Nursing Facilities to August 1, 2025**

February 2025

**2025 Health Care Reimbursement Newsletter**

November 6, 2024

**Calling All SNFs... and All of Your Operational Associates – Get Ready Now: Sweeping New Disclosure Requirements Under The Updated 855A**

August 7, 2024

**Top Questions Health Care Providers Should Consider in a Post-Chevron World – A Polsinelli Round Table Discussion**

January 4, 2024

**Reimbursement End-of-Year Highlights**

March 1, 2023

**Health Care Reimbursement and Payor Dispute Update**

April 24, 2020

**HHS Makes Funds Available to SNFs to Care for Uninsured COVID-19 Patients**

*Co-Author, COVID-19 Blog*